

To: Christenson, Kara[Christenson.Kara@epa.gov]; Spiegelman, Nina[Spiegelman.Nina@epa.gov]
From: Maldonado, Lewis
Sent: Fri 2/3/2017 8:57:39 PM
Subject: Fwd: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

Ex. 5 & 7

Lewis

Sent from my iPhone

Begin forwarded message:

From: "Meer, Daniel" <Meer.Daniel@epa.gov>
Date: February 3, 2017 at 12:44:55 PM PST
To: "Allen, HarryL" <Allen.HarryL@epa.gov>
Cc: "Lawrence, Kathryn" <Lawrence.Kathryn@epa.gov>, "Maldonado, Lewis" <Maldonado.Lewis@epa.gov>, "Lyons, John" <Lyons.John@epa.gov>, "MUSANTE, JASON" <Musante.Jason@epa.gov>
Subject: **RE: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations**

Kay and I talked to Enrique about this. We will follow up with the Enforcement Division and Air Division. This is more a permitting and air enforcement issue than a response or prevention issue. Dan

Daniel A. Meer, Assistant Director

Superfund Division

Emergency Response, Preparedness and Prevention Branch

415.972.3132 (O)

415.971.6792 (C)

From: Allen, HarryL
Sent: Friday, February 03, 2017 9:36 AM
To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>

Cc: Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>; Meer, Daniel <Meer.Daniel@epa.gov>; Maldonado, Lewis <Maldonado.Lewis@epa.gov>; Lyons, John <Lyons.John@epa.gov>; MUSANTE, JASON <Musante.Jason@epa.gov>

Subject: Re: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

I'm on leave today but you can pull Jason in on phones but may be traveling he can be reached at 213-479-2130. Problem is there's very little for us to do much at an ammonia release. The vapor pressure of ammonia is so great that it's very difficult to detect offsite. On the property, it's typically the purview of first responders and as a result our ER team doesn't have very much ammonia experience in terms of response and clean up.

Kay's group however has close ties with the national experts in the area, ASTI. My suggestion would be to consult with them to start out. Sounds like much more of an enforcement type of situation than a response.

Sent from my iPhone

On Feb 3, 2017, at 9:26 AM, Manzanilla, Enrique <Manzanilla.Enrique@epa.gov> wrote:

Lets try to touch base on this one today if possible.

From: Strauss, Alexis

Sent: Friday, February 3, 2017 9:20 AM

To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; Johnson, Kathleen <Johnson.Kathleen@epa.gov>; Adams, Elizabeth <Adams.Elizabeth@epa.gov>

Cc: McKaughan, Colleen <McKaughan.Colleen@epa.gov>; Quast, Sylvia <Quast.Sylvia@epa.gov>

Subject: FW: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

From: Don't Waste Arizona [<mailto:dwaz@fastq.com>]

Sent: Friday, February 3, 2017 9:10 AM

To: Cabrera.misael@azdeq.gov; Randall G. Matas <Matas.Randall@azdeq.gov>

Cc: Strauss, Alexis <Strauss.Alexis@epa.gov>

Subject: Re: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

An additional issue raised by the “modeling” conducted by ADEQ:

ADEQ referenced an “MRL (Minimal Risk Level): 1.7 ppm (1,224 µg/3), derived for acute-duration inhalation exposure (14 days or less)”

However, these Hickman’s facilities have been releasing ammonia every day into the affected communities for years now, and the ATSDR has set an MRL of 0.1 ppm has been derived for chronic-duration inhalation exposure (365 days or more) to ammonia. [An MRL of 0.1 ppm has been derived for chronic-duration inhalation exposure (365 days or more) to ammonia. <http://www.atsdr.cdc.gov/toxprofiles/tp126-c8.pdf>]

Clearly, by ADEQ’s own calculations and admission, these affected communities are being harmed.

So when is there going to be an emergency response?

I look forward to your response.

Stephen M. Brittle

DWAZ

Sent: Thursday, February 02, 2017 5:16 PM

To: cabrera.misael@azdeq.gov ; [Randall G. Matas](#)

Cc: [Alexis Strauss](#)

Subject: ammonia releases at Hickman's facilities require emergency response, per ADEQ's own calculations

Dear Mr. Cabrera and Mr. Matas:

Attached is the file I received today from ADEQ regarding its modeling of ammonia emissions (releases) from the Hickman's Arlington and Tonopah facilities. Even though I believe the emissions rates/bird are understated, and that ADEQ failed to use the proper software for modeling chemical releases (ALOHA), and also set the release height too low, among other issues, I used the data supplied to get the following result:

I did a simple grams to pounds conversion and found that even ADEQ's computation show exceedances of the 100 lb reportable quantity for ammonia every day. (EPCRA requires that the SERC and LEPC of jurisdiction must be notified immediately when a facility emits > 100 pounds/day of ammonia.)

In fact, according to ADEQ's own estimations:

Tonopah would be emitting 1,909.873 lbs/day of ammonia.

Arlington would emit 2311.646 lbs/day + 1341.585 lbs/day for a total of 3,653.231 lbs/day of ammonia.

So when is there going to be an emergency response?

I look forward to your response.

Stephen M. Brittle

DWAZ